

UNITED STATES DISTRICT COURT  
for THE  
SOUTHERN DISTRICT OF ILLINOIS

Brian K. Bowlby

PLAINTIFF

V.S.

Saline County  
SHERIFF'S DEPT.  
ILLINOIS

DEFENDANT

14-773-NJR

SCANNED AT MENARD and E-mailed  
1-9-11 by BS 27 pages  
date initials No.

COMPLAINT  
COUNT 1

I Brian K. Bowlby come pro-se  
for a CAUSE OF ACTION AGAINST Saline  
County Sheriff's Department for  
WRONGFUL CONVICTION AND INCARCERATION AND  
STATES AS FOLLOWS:

I ON OR ABOUT JANUARY 21 2011  
PLAINTIFF WAS ARRESTED BY CENTRALIA  
POLICE DEPT. ON A WARRANT FROM Saline  
COUNTY, HANCOCK COUNTY, ILLINOIS

2 ON OR ABOUT JANUARY 25 2011 A GRAND JURY WAS HELD DEFENDANT WAS NOT ALLOWED TO ATTEND AS FOR HIS OWN DEFENCE

3 ON OR ABOUT JANUARY 26 2011 THE COURT APPOINTED LOWELL TISON JR TO REPRESENT THE ABOVE PLAINTIFF IN SALINE COUNTY CASE NO 2011-CF-22

4 ON OR ABOUT JANUARY 27, 2011 THE ABOVE PLAINTIFF SPOKE TO ATTORNEY LOWELL TISON ABOUT CONFLICT OF INTEREST

5 ATTORNEY LOWELL TISON WAS THE STATE'S ATTORNEY WHO HANDLED THE DCF'S CASE 02-JA-25, 26, 27, 28

6 ATTORNEY LOWELL TISON FAILED TO INVESTIGATE INTO THE ALLEGATIONS.

7 SALINE COUNTY ASSISTANT STATE'S ATTORNEY EVA WALKER FAILED TO INVESTIGATE INTO THE ALLEGATIONS ALLEGED IN SALINE COUNTY CASE NO 2011-CF-22

8 ON or ABOUT February 1 2012 ASS. STATE'S  
ATTORNEY Made improper and prejudicial  
COMMENTS IN OPENING STATEMENTS

9 ON or ABOUT February 2 2012 ASS. STATE'S  
ATTORNEY EVA Walker Made improper AND  
prejudicial COMMENTS IN CLOSING ARGUMENTS

10 THE STATE CALLED STACY ALLEN To TESTIFY  
AT Trial To SHOW propensity ~~of~~

11 THE ALLEDGED ACTS STACY ALLEN TESTIFIED To  
ARE IN excess OF 20 years OLD UNCHARGED AND  
UNPROVEN ALLAGATIONS

12 ON or ABOUT February 2 2012 PLAINTIFF  
WAS wrongfully CONVICTED OF 18 COUNTS OF  
Predatory CRIMINAL SEXUAL ASSAULT OF A CHILD  
AND ONE COUNT OF CRIMINAL SEXUAL ABUSE

13 following THE Trial plaintiff filed  
A MOTION for a NEW Trial do To ineffective  
ASSISTANCE of COUNCIL

14 THE COURT APPOINTED ATTORNEY  
NATHAN ROLLAND TO INVESTIGATE INTO  
THE MOTIONS ALLEGATIONS

15 PLAINTIFFS MOTIONS WAS DENIED

16 PLAINTIFFS WAS SENTENCED TO  
THE ILLINOIS DEPARTMENT OF CORRECTIONS

17 PLAINTIFF FILED NOTICE OF APPEAL

18 PLAINTIFFS APPEAL IS STILL  
PENDING

WHEREFORE THE PLAINTIFF  
BRIAN K. BOWBY PRAYS JUDGEMENT  
AGAINST SANGUI COUNTY SHERIFF'S DEPT  
IN THE SUM OF SEVEN HUNDRED  
AND FIFTY THOUSAND DOLLARS (750,000)  
PLUS THE COST OF THIS SUIT

COUNT II

Brian K Bowlby for Additional  
Cause of Action Against Saline County  
Sheriff's Department As To Count  
II of case number 11-CF-22 AND  
STATES THAT

1-18. The plaintiff repeats and  
re-alleges the allegations contained  
in paragraphs (1)-(8) of count I as  
and for paragraphs (1)-(8) of this  
count

Wherefore the plaintiff Brian  
K Bowlby prays judgment against  
Saline County Sheriff's Department  
in the sum of Seven Hundred  
Fifty Thousand Dollars (750,000)  
Plus the cost of this suit

Plaintiff Demand's Trial  
of this count by Jury

COUNT III

Brian K Bowlby is Additional  
Cause of Action Against Saline County  
Sheriff's Department AS TO COUNT III  
OF CASE NUMBER 11-CF-22 AND STATES  
THAT

1-13 The plaintiff repeats AND  
reallleges THE ALLEGATIONS CONTAINED  
IN PARAGRAPHS (1)-(8) OF COUNT I AS  
AND FOR PARAGRAPHS (1)-(8) OF THIS COUNT

Wherefore THE plaintiff  
Brian K Bowlby prays Judgement  
Against Saline County Sheriff's  
Department IN THE SUM OF Seven  
hundred fifty THOUSAND DOLLARS  
(\$750,000) PLUS THE COST OF THIS  
SUIT

Plaintiff Demands Trial of  
THIS COUNT BY JURY

COUNT IV

Brian K Bowlby for additional  
cause of action against Saline County  
Sheriff's Dept. as to Count IV of Case  
Number 11-CF-22 AND STATES THAT

1-18 The Plaintiff repeats and  
reallleges the allegations contained  
in paragraphs (1)-(18) of Count I as  
and for paragraphs (1)-(18) of this  
COUNT

Wherefore The Plaintiff Brian  
K Bowlby prays Judgment Against  
Saline County Sheriff's Dept. in  
The sum of Seven Hundred fifty  
Thousand Dollars (\$750,000) Plus  
The cost of this suit

Plaintiff Demands Trial  
of this Count by Jury



COUNT V

Brian K. Bowlby for ADDITIONAL  
CAUSE OF ACTION AGAINST SALINE COUNTY  
SHERIFF'S DEPT. AS TO COUNT V OF CASE  
NUMBER 11-CF-22 AND STATES THAT

1-18 THE PLAINTIFF REPEATS  
AND REALLIGES THE ALLEGATIONS  
CONTAINED IN PARAGRAPHS C13-C18J  
OF COUNT I AS AND FOR PARAGRAPHS C13-  
C18J OF THIS COUNT

WHEREFORE THE PLAINTIFF BRIAN  
K. BOWLBY PRAYS JUDGEMENT AGAINST  
SALINE COUNTY SHERIFF'S DEPARTMENT  
IN THE SUM OF SEVEN HUNDRED FIFTY  
THOUSAND DOLLARS (750,000) PLUS  
THE COST OF THIS SUIT

PLAINTIFF DEMANDS TRIAL  
OF THIS COUNT BY JULY



COUNT VI

Brian K Bowlby for ADDITIONAL  
CAUSE OF ACTION AGAINST SALINE COUNTY  
SHERIFF'S DEPARTMENT AS TO COUNT VI  
OF CASE NUMBER 11-CF-22 AND  
STATES THAT

1-18 THE PLAINTIFF REPEATS  
AND RE-ALLEGES THE ALLEGATIONS  
CONTAINED IN PARAGRAPHS (1)-(18) OF  
COUNT I AS AND FOR PARAGRAPHS  
(1)-(18) OF THIS COUNT

WHEREFORE THE PLAINTIFF  
BRIAN K BOWLBY PRAYS JUDGEMENT  
AGAINST SALINE COUNTY SHERIFF'S  
DEPARTMENT IN THE SUM OF SEVEN  
HUNDRED FIFTY THOUSAND DOLLARS  
(750,000) PLUS THE COST OF THIS  
SUIT

PLAINTIFF DEMANDS TRIAL OF  
THIS COUNT BY JURY

## COUNT VII

Brian K Bowlby for Additional  
CAUSE OF ACTION AGAINST SALINE COUNTY  
SHERIFF'S DEPARTMENT AS TO COUNT VII  
OF CASE NUMBER 11-CF-22 AND STATES  
THAT

1-18. THE PLAINTIFF REPEATS AND  
REALLIGES THE ALLEGATIONS CONTAINED  
IN PARAGRAPHS (1)-(18) OF COUNT I. AS  
AND FOR PARAGRAPHS (1)-(18) OF THIS  
COUNT

WHEREFORE THE PLAINTIFF BRIAN  
K. BOWLBY PRAYS JUDGEMENT  
AGAINST SALINE COUNTY SHERIFF'S DEPT.  
IN THE SUM OF SEVEN HUNDRED  
FIFTY THOUSAND DOLLARS (\$750,000)  
PLUS THE COST OF THIS SUIT

PLAINTIFF DEMANDS TRIAL  
OF THIS COUNT BY JURY

COUNT V III

Brian K Bowlby for ADDITIONAL  
CAUSE OF ACTION AGAINST SALINE COUNTY  
SHERIFF'S DEPARTMENT AS TO COUNT V III  
OF CASE NUMBER 11-CF-21 AND STATES  
THAT

1-18 THE PLAINTIFF REPORTS AND  
RECALLEDGES THE ALLEGATIONS CONTAINED  
IN PARAGRAPHS (1)-(18) OF COUNT I AS AND  
FOR PARAGRAPHS (1)-(18) OF THIS COUNT

WHEREFORE THE PLAINTIFF  
BRIAN K BOWLBY PRAYS JUDGMENT  
AGAINST SALINE COUNTY SHERIFF'S DEPT.  
IN THE SUM OF SEVEN HUNDRED FIFTY  
THOUSAND DOLLARS (\$750,000) PLUS  
THE COST OF THIS SUIT

PLAINTIFF DEMANDS TRIAL  
OF THIS COUNT BY JURY

COUNT IX

Brian K. Bowlby for Additional  
Cause of Action Against Saline County  
Sheriff's Department as to Count IX  
of Case Number 11-CF-22 and states  
that

1-18 The plaintiff repeats and  
reaffirms the allegations contained  
in paragraphs (1)-(18) of Count I as  
and for paragraphs (1)-(18) of this  
count

Wherefore the plaintiff  
Brian K. Bowlby prays judgment  
against Saline County Sheriff's Dept.  
in the sum of Seven Hundred fifty  
Thousand Dollars (\$750,000) plus  
the cost of this suit

Plaintiff Demands Trial  
of this count by Jury

## COUNT X

Brian K Bowlby for Additional  
Cause of Action Against Saline County  
Sheriff's Department As To Count X  
Of Case Number 11-CF-22 AND STATES  
THAT

1-18 The plaintiff repeats and  
re-alleges the allegations contained  
in paragraphs (1)-(18) of Count I as  
and for paragraphs (1)-(18) of this  
COUNT

Wherefore the plaintiff  
Brian K Bowlby prays Judgment  
Against Saline County Sheriff's Dept.  
in the sum of Seven Hundred fifty  
THOUSAND DOLLARS (\$750,000) Plus  
The Cost of This Suit

Plaintiff Demands Trial  
of This Count by Jury

COUNT XI

Brian K Bowlby for Additional  
CAUSE OF ACTION AGAINST SALINE COUNTY  
SHERIFF'S DEPARTMENT AS TO COUNT XI  
OF CASE NUMBER 11-CF-22 AND STATES  
THAT

1-18 THE PLAINTIFF REPEATS AND  
RE-ALLEGES THE ALLEGATIONS CONTAINED  
IN PARAGRAPHS (1)-(18) OF COUNT I AS  
AND FOR PARAGRAPHS (1)-(18) OF THIS COUNT

WHEREFORE THE PLAINTIFF  
BRIAN K BOWLBY PRAYS JUDGEMENT  
AGAINST SALINE COUNTY SHERIFF'S DEPT.  
IN THE SUM OF SEVEN HUNDRED FIFTY  
THOUSAND DOLLARS (\$750,000) PLUS  
THE COST OF THIS SUIT

PLAINTIFF DEMAND TRIAL  
OF THIS COUNT BY JURY

COUNT XII

Brian K Bowlby For ADDITIONAL  
CAUSE OF ACTION AGAINST SALINE COUNTY  
SHERIFF'S DEPARTMENT AS TO COUNT XII  
OF CASE NUMBER 11-CF-22 AND STATES  
THAT

1-18 THE PLAINTIFF REPEATS AND  
REALLLEGES THE ALLEGATIONS CONTAINED  
IN PARAGRAPHS (1)-(18) OF COUNT I AS  
AND FOR PARAGRAPHS (1)-(18) OF THIS  
COUNT

WHEREFORE THE PLAINTIFF BRIAN  
K. BOWLBY PRAYS JUDGEMENT AGAINST  
SALINE COUNTY SHERIFF'S DEPARTMENT  
IN THE SUM OF SEVEN HUNDRED FIFTY  
THOUSAND DOLLARS (\$750,000) PLUS  
THE COST OF THIS SUIT

PLAINTIFF DEMANDS TRIAL  
OF THIS COUNT BY JURY



COUNT XIII

Brian K Bowlby for Additional  
Cause of Action Against Saline County  
Sheriff's Department As To Count XIV  
of Case Number 11-CF-22 AND STATE'S THAT

1-18 THE PLAINTIFF REPEATS AND  
REALLEGES THE ALLEGATIONS CONTAINED  
IN PARAGRAPHS (1)-(18) OF COUNT I AS  
AND FOR ~~THE~~ PARAGRAPHS (1)-(18) OF THIS  
COUNT.

WHEREFORE THE PLAINTIFF BRIAN  
K BOWLBY PRAYS JUDGEMENT AGAINST  
SALINE COUNTY SHERIFF'S DEPARTMENT  
IN THE SUM OF SEVEN HUNDRED FIFTY  
THOUSAND DOLLARS (\$750,000) PLUS  
THE COST OF THIS SUIT

PLAINTIFF DEMANDS TRIAL  
OF THIS COUNT BY JULY

## COUNT XIV

Brian K. Bowlby for ADDITIONAL  
CAUSE OF ACTION AGAINST SALINE COUNTY  
SHERIFF'S DEPARTMENT AS TO COUNT XV  
OF CASE NUMBER 11-CF-22 AND STATES

1-18. The plaintiff repeats AND  
reallleges THE ALLEGATIONS CONTAINED  
IN PARAGRAPHS (D)-(18) OF ~~THE~~ COUNT I AS  
AND FOR PARAGRAPHS (D)-(18) OF THIS  
COUNT

Wherefore THE plaintiff Brian K.  
Bowlby prays JUDGEMENT AGAINST  
SALINE COUNTY SHERIFF'S DEPARTMENT  
IN THE SUM OF SEVEN HUNDRED FIFTY  
THOUSAND DOLLARS (\$750,000) PLUS  
THE COST OF THIS SUIT

Plaintiff Demands Trial of  
THIS COUNT by Jury

COUNT XV

Brian K Bowlby for Additional  
CAUSE OF ACTION AGAINST Saline  
County Sheriff's Department AS TO  
COUNT XVI OF CASE Number 11-CF-22  
AND STATE'S THAT

1-18 The plaintiff repeats AND  
reallleges THE ALLEGATIONS CONTAINED  
IN PARAGRAPHS C1)-(18) OF COUNT I AS  
AND for PARAGRAPHS C1)-(18) OF THIS  
COUNT

Wherefore The plaintiff  
Brian K. Bowlby prays Judgment  
Against Saline County Sheriff's  
Department IN THE SUM of Seven  
Hundred fifty THOUSAND DOLLARS  
(750,000) PLUS THE COST OF THIS  
SUIT

Plaintiff Demands Trial  
of THIS COUNT by Jury

COUNT XVI

Brian K Bowlby for ADDITIONAL  
CAUSE OF ACTION AGAINST SALINE COUNTY  
SHERIFF'S DEPARTMENT AS TO COUNT XVII  
OF CASE NUMBER 11-CF-22 AND STATE'S  
THAT

1-18 THE PLAINTIFF REPEATS AND  
REALLARGES THE ALLEGATIONS CONTAINED  
IN PARAGRAPHS (1)-(18) OF COUNT I AS  
AND FOR PARAGRAPHS (1)-(18) OF THIS  
COUNT

WHEREFORE THE PLAINTIFF BRIAN  
K BOWLBY PRAYS JUDGMENT AGAINST  
SALINE COUNTY SHERIFF'S DEPARTMENT  
IN THE SUM OF SEVEN HUNDRED FIFTY  
THOUSAND DOLLARS (\$750,000) PLUS  
THE COST OF THIS SUIT

PLAINTIFF DEMANDS TRIAL  
OF THIS COUNT BY JULY

COUNT XV 11

Brian K Bowlby for ADDITIONAL  
CAUSE OF ACTION AGAINST SALINE  
COUNTY SHERIFF'S DEPARTMENT AS TO  
COUNT XVIII OF CASE NUMBER 11-CF-22  
AND STATE'S THAT

1-18 THE PLAINTIFF REPEATS AND  
REALLIGES THE ALLEGATIONS CONTAINED  
IN PARAGRAPHS (12)-(18) OF COUNT I AS  
AND FOR PARAGRAPHS (12)-(18) OF THIS  
COUNT

WHEREFORE THE PLAINTIFF  
BRIAN K BOWLBY PRAYS JUDGMENT  
AGAINST SALINE COUNTY SHERIFF'S  
DEPARTMENT IN THE SUM OF SEVEN  
HUNDRED FIFTY THOUSAND DOLLARS  
(\$750,000) PLUS THE COST OF THIS  
SUIT

PLAINTIFF DEMANDS TRIAL  
OF THIS COUNT BY JURY

COUNT XV III

Brian K Bowlby for Additional  
Cause of Action Against Saline  
County Sheriff's Department As  
To Count XIX of Case Number 11-CF-22  
AND STATE'S THAT

1-18. The plaintiff repeats AND  
re-alleges the ALLEGATIONS CONTAINED  
IN PARAGRAPHS (1)-(18) OF COUNT I AS  
AND for PARAGRAPHS (1)-(18) OF THIS  
COUNT

Wherefore The Plaintiff  
Brian K Bowlby prays Judgment  
Against Saline County Sheriff's  
Department in the Sum of Seven  
Hundred fifty THOUSAND DOLLARS  
(\$750,000) PLUS THE COST OF THIS  
SUIT

Plaintiff DEMANDS Trial  
of THIS COUNT by Jury



COUNT XIX

Brian K Bowlby for ADDITIONAL  
CAUSE OF ACTION AGAINST SALINE COUNTY  
SHERIFF'S DEPARTMENT AS TO COUNT XXI  
OF CASE NUMBER 11-CF-22 AND STATE'S

1-18 THE PLAINTIFF REPEATS AND  
REALLEDGES THE ALLEGATIONS CONTAINED  
IN PARAGRAPHS (C)-(18) OF COUNT I AS  
AND FOR PARAGRAPHS (C)-(18) OF THIS  
COUNT

WHEREFORE THE PLAINTIFF  
BRIAN K BOWLBY PLAYS JUDGMENT  
AGAINST SALINE COUNTY SHERIFF'S  
DEPARTMENT IN THE SUM OF SEVEN  
HUNDRED FIFTY THOUSAND DOLLARS  
(\$750,000) PLUS THE COST OF THIS  
SUIT AND SEVEN HUNDRED FIFTY  
THOUSAND FOR MENTAL STRESS (\$750,000)  
PLUS THE COST OF INCARCERATION

PLAINTIFF DEMANDS TRIAL OF  
THIS COUNT BY JURY



Under penalty of perjury The  
INFORMATION CONTAINED Here in is  
True AND Correct To THE best of My  
KNOWLEDge

*Brian Bowlby*

Brian K Bowlby  
B88543  
P.O. Box 1000  
MENARD IL 62259

Notice AND proof of Service

TO DONALD KIEHL BROWN  
LAW ENFORCEMENT & DETENTION CENTER  
ONE N Main Street SUIT 3  
HARRISBURG IL 62946